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|---|----------------------------------|-----------------|
| 1 | 1. Discovery Cutoff Date: | June 14, 2021 |
| 2 | 2. Amendment of Pleadings: | March 16, 2021 |
| 3 | 3. Expert Designations: | April 15, 2021 |
| 4 | 4. Rebuttal Expert Designations: | May 17, 2021 |
| 5 | 5. Dispositive Motions: | July 14, 2021 |
| 6 | 6. Joint Pre-Trial Order: | August 13, 2021 |

7 While the parties would like to reach a settlement, due to Covid-19, there have
 8 been delays in conducting discovery and the parties recently reach an agreement to
 9 allow Plaintiff to amend the Complaint to add another Defendant. As such, Plaintiff is
 10 in the process of Amending the Complaint. Therefore, the parties need additional time
 11 to conduct discovery in preparation for initial expert disclosures. Moreover, additional
 12 time is required to conduct any additional written discovery, schedule depositions and
 13 to complete discovery. Accordingly, the parties are requesting a 90-day extension to
 14 all discovery deadlines.

15 The instant request comports with Local Rule IA 6-1, in that no request is being
 16 made after the expiration of the specified period.

17 **I. LOCAL RULE 26-3 IS SATISFIED**

18 The instant request to extend discovery deadlines satisfies the requisites of Local
 19 Rule 26-3. Additionally, good cause exists for the extension. While the parties would
 20 like to reach a settlement, due to Covid-19, there have been delays in conducting
 21 discovery and the parties recently reach an agreement to allow Plaintiff to amend the
 22 Complaint to add another Defendant. As such, Plaintiff is in the process of Amending
 23 the Complaint to add another Defendant. Therefore, the parties need additional time to
 24 conduct discovery in preparation for initial expert disclosures. Moreover, additional
 25 time is required to conduct any additional written discovery, schedule depositions and
 26 to complete discovery. As a result, the parties request all discovery deadlines be
 27 extended 90-days.

28 Listed below is a statement specifying the discovery completed in this case:

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| 1 | Plaintiff's Initial Disclosures Pursuant to Fed. | September 24, 2020 |
| 2 | R. Civ. P. 26(a)(1) | |
| 3 | Defendant James River Insurance Company's | October 30, 2020 |
| 4 | Initial Early Case Conference List of Witnesses | |
| 5 | and Documents Pursuant to FRCP 26(a)(1) | |
| 6 | Plaintiff's First Set of Requests for Production | January 7, 2021 |
| 7 | To Defendant | |
| 8 | Defendant James River Insurance Company's | February 8, 2021 |
| 9 | First Supplement to Early Case Conference | |
| 10 | List of Witnesses and Documents Pursuant to | |
| 11 | FRCP 26(a)(1) | |
| 12 | Defendant James River Insurance Company's | February 8, 2021 |
| 13 | Responses to Plaintiff's First Set of Requests | |
| 14 | for Production of Documents | |
| 15 | First Supplement to Plaintiff's Initial Disclosures | March 10, 2021 |
| 16 | Pursuant to Fed. R. Civ. P. 26(a)(1) | |

Due to Covid-19, there have been delays in conducting discovery and the parties recently reach an agreement to allow Plaintiff to amend the Complaint to add another Defendant. As such, Plaintiff is in the process of Amending the Complaint. Therefore, the parties need additional time to conduct discovery in preparation for initial expert disclosures. Moreover, additional time is required to conduct any additional written discovery, schedule depositions and to complete discovery. As a result, the parties request all discovery deadlines be extended 90-days. Due to the fact that a new Defendant is being added to the litigation, it is necessary to extend the discovery deadlines so there is time to procure all relevant records, exchange any additional written discovery, obtain experts, schedule depositions and conduct any other necessary discovery.

Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule for completing all remaining discovery. The parties are requesting an additional 90 days be afforded for discovery.

The following deadlines are requested.

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|----------------------------|--------------------|
| 1. Discovery Cutoff Date: | September 13, 2021 |
| 2. Amendment of Pleadings: | June 15, 2021 |

- | | |
|----------------------------------|-------------------|
| 3. Expert Designations: | July 15, 2021 |
| 4. Rebuttal Expert Designations: | August 16, 2021 |
| 5. Dispositive Motions: | October 13, 2021 |
| 6. Joint Pre-Trial Order: | November 12, 2021 |

The parties hereby stipulate to the proposed changes in the discovery deadlines.

Dated this 15th day of March 2021

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COGBURN LAW

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ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: March 16, 2021

The **STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST REQUEST)** in 2:20-cv-01666-JCM-DJA was submitted by:

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